

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

PAUL HASTINGS LLP  
Kris Hansen (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
(212) 318-6400

-and-

Matthew M. Murphy (admitted *pro hac vice*)  
Matthew Micheli (admitted *pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
(312) 499-6018

COLE SCHOTZ P.C.  
Court Plaza North  
25 Main Street, P.O. Box 800  
Hackensack, New Jersey 07602-0800  
Michael D. Sirota (NJ Bar No. 014321986)  
Warren A. Usatine (NJ Bar No. 025881985)  
Seth Van Aalten (admitted *pro hac vice*)  
Justin Alberto (admitted *pro hac vice*)  
(201) 489-3000

PARKINS & RUBIO LLP  
Lenard M. Parkins (admitted *pro hac vice*)  
Charles M. Rubio (admitted *pro hac vice*)  
700 Milam, Suite 1300  
Houston, Texas 77002  
(713) 715-1666

*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT, LLC<sup>1</sup>,  
Debtor.

Case No. 23-12825

Chapter 11

**Hearing Date and Time:  
June 1, 2023 at 10:00 AM**

Judge: Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF MOTION OF THE AD HOC COMMITTEE OF SUPPORTING COUNSEL  
TO FILE UNDER SEAL AND REDACT CERTAIN INFORMATION IN VERIFIED  
STATEMENT OF PAUL HASTINGS LLP, COLE SCHOTZ P.C., AND PARKINS &  
RUBIO LLP PURSUANT TO BANKRUPTCY RULE 2019**

**PLEASE TAKE NOTICE** that, on June 1, 2023 at 10:00 a.m., or as soon thereafter as counsel may be heard, a hearing on the *Motion of the Ad Hoc Committee of Supporting Counsel to File Under Seal and Redact Certain Information in Verified Statement of Paul Hastings LLP, Cole Schotz P.C., and Parkins & Rubio LLP Pursuant to Bankruptcy Rule 2019* (the “Motion”) will be held before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), 402 East State Street, Trenton, New Jersey 08608.

**PLEASE TAKE FURTHER NOTICE** that the Motion sets forth the relevant factual bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at [www.njb.uscourts.gov](http://www.njb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with

the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date.

**PLEASE TAKE FURTHER NOTICE** that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion as requested by the Debtors.

**PLEASE TAKE FURTHER NOTICE** that unless responses are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Dated: May 9, 2023

**COLE SCHOTZ P.C.**

*/s/ Michael D. Sirota*

---

Michael D. Sirota (NJ Bar No. 014321986)  
Warren A. Usatine (NJ Bar No. 025881995)  
Seth Van Aalten (admitted *pro hac vice*)  
Justin Alberto (admitted *pro hac vice*)  
Court Plaza North, 25 Main Street  
Hackensack, NJ 07602-0800  
(201) 489-3000  
Email: msirota@coleschotz.com  
wusatine@coleschotz.com  
svanaalten@coleschotz.com  
jalberto@coleschotz.com

– and –

**PAUL HASTINGS LLP**

Kris Hansen (admitted *pro hac vice*)  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Email: krishansen@paulhastings.com

Matthew M. Murphy (admitted *pro hac vice*)  
Matthew Micheli (admitted *pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, IL 60606

Telephone: (312) 499-6000  
Email: mattmurphy@paulhastings.com  
mattmicheli@paulhastings.com

– and –

**PARKINS & RUBIO LLP**

Lenard M. Parkins (admitted *pro hac vice*)  
Charles M. Rubio (admitted *pro hac vice*)  
700 Milam, Suite 1300  
Houston, TX 77002  
Telephone: (713) 715-1660  
Facsimile: (713) 715-1699  
Email: lparkins@parkinsrubio.com  
crubio@parkinsrubio.com

*Counsel to Ad Hoc Committee  
of Supporting Counsel*